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PACIFIC  **TELESIS**
Group - Washington

December 14, 1992

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OFFICE OF THE SECRETARY

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Ms Searcy:

Re: CC Docket No. 92-77 - Billed Party Preference for 0+ InterLATA Calls

On behalf of Pacific Bell and Nevada Bell, please find enclosed an original and six copies of their "Comments" in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,



Enclosures

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY
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In the Matter of)
)
Billed Party Preference)
for 0+ InterLATA Calls)
)

CC Docket No. 92-77
Phase I

COMMENTS OF PACIFIC BELL AND NEVADA BELL

Pacific Bell and Nevada Bell ("the Pacific Companies") file these comments in response to the Request for Supplemental Comment in the Commission's Report and Order released November 6, 1992.¹ The Commission seeks comment on methods for compensating operator service providers ("OSPs") who receive 0+ dialed proprietary card calls and who wish to transfer those calls to the card issuer. The Commission also seeks specific information as to how such a transfer service would work.

The Pacific Companies will not be directly affected by any service by which an OSP transfers a call to another OSP. The local exchange companies have no existing technology that facilitates this sort of 0+ transfer. The ability to accomplish such a transfer could only occur after standards have been developed and approved by the industry.

To respond to the Commission's request for information on LEC-IXC interconnection arrangements, Pacific provides an 0-transfer service. However, this service cannot be used to transfer 0+ calls. 0- calls are those where an end user dials


¹ Billed Party Preference for 0+ InterLATA Calls, CC Docket No. 92-77 Phase I, Report and Order and Request for Supplemental Comment, released November 6, 1992 ("Report and Order").

"0" without then dialing a telephone number. This tariffed service is offered for customers who, for whatever reason, dial 0- and seek an interexchange carrier operator, or operator service provider ("OSP"). If the OSP requested by the customer has purchased this service from Pacific, Pacific will transfer the call to that carrier and the carrier pays Pacific the tariffed rate of \$.30 for that transfer. Again, Pacific does not anticipate that this service will be a substitute for the transfer service on which the Commission seeks comment in the Report and Order.

The Pacific Companies support the Commission's efforts to gain industry consensus on the interim measures discussed in the Report and Order. However, the Pacific Companies view the long term solution to the problems identified by the Commission as billed party preference.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, S. L. McGreevy, hereby certify that copies of the foregoing "COMMENTS OF PACIFIC BELL AND NEVADA BELL" were served by hand or by first-class United States mail, postage prepaid, upon the parties appearing on the attached service list this 14th day of December, 1992.

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